

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

NEWPORT NEWS DIVISION

UNITED STATES OF AMERICA)

V.)

ANTOINETTE ASHBY)

Criminal No. 4:11cr89



STATEMENT OF FACTS

Comes now the United States and offers to the court that had the above-styled matter proceeded to trial the United States would have proven the following facts beyond a reasonable doubt.

1. In 2010, an investigation began into the drug activities of an organization located in the Denbigh Area of Newport News, Virginia. This investigation is being conducted by the Federal Bureau of Investigation, Immigration and Customs Enforcement, the Newport News Police Department, and the Virginia Department of State Police. The targeted organization is centered around two housing areas in Newport News, Aquaduct Apartments and Woodlawn Apartments. The individuals in the indictment (with the exception of Ms Ashby) comprised an organization which dealt cocaine, cocaine base and marijuana in Newport News and other areas of the Virginia Peninsula. The sources of supply for these individuals reside in California, Georgia, North Carolina and Texas. Federal agents and task force agents interviewed cooperating witnesses who identified the defendant as having laundered monies for Kenneth Jones, a member of this conspiracy.

2. On January 9, 2009, the defendant made a \$9000.00 cash down payment on a 2002 Mercedes Benz automobile in Virginia Beach, Virginia. The funds for the initial purchase of the

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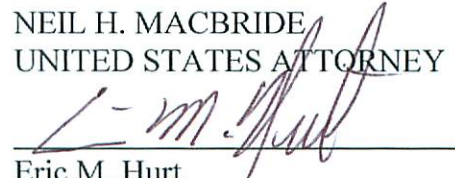
vehicle were provided by Mr. Jones who was an ex-boyfriend of the defendant and the two had previously resided together, but had separated at the time of the transaction. Mr. Jones asked the defendant to purchase the vehicle in her name to disguise his interest in the vehicle since he did not possess legitimate employment or income to purchase the vehicle. On February 24, 2009, the transfer of title on the 2002 Mercedes Benz (VIN number WDBPJ75J42A030314) to the defendant occurred. This was followed on March 30, 2009, by two \$500.00 money orders payable for the automobile. The monthly payments on the vehicle were \$571.00. In 2008 and 2009 the defendant had reported income of approximately \$22,000. Nevertheless, the defendant made payments on this vehicle from 2009 until the seizure of the vehicle by law enforcement officials in the fall of 2011. At all times, the vehicle was registered in her name until it was sold earlier in 2012 after being returned to her possession.

3. The Defendant was aware that the funds for the purchase of the Mercedes Benz involved the ~~probable~~ proceeds of a specified unlawful activity. The purchase of the Mercedes Benz in the name of defendant Ashby permitted Mr. Jones to conceal the proceeds of his specified unlawful activity. The parties do not agree on the issue of defendant Ashby's knowledge concerning the nature of the specified unlawful activity.

4. These events occurred in the Newport News Division of the Eastern District of Virginia.

Respectfully submitted,

NEIL H. MACBRIDE
UNITED STATES ATTORNEY

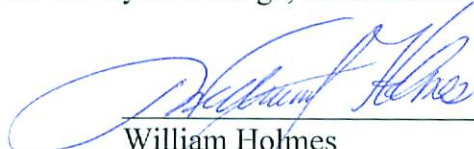

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ANTOINETTE ASHBY and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


ANTOINETTE ASHBY

I am ANTOINETTE ASHBY's attorney and I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, the decision to stipulate to these facts is an informed and voluntary one.


William Holmes
Attorney for ANTOINETTE ASHBY


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